

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
1:17 CR 460-01

UNITED STATES OF AMERICA

v.

PAULA K. BULLOCK

Consent Motion to Extend Deadline  
for Pre-Trial Motions

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COMES NOW Paula Kay Bullock, by and through undersigned counsel, defendant in the above-captioned case, and does move this Court to extend the deadline for pre-trial motions in the above-captioned case. In support of this Motion, Defendant states the following:

1. Defendant was arraigned on a superseding indictment on October 5th, 2018.
2. Pursuant to the Court's scheduling order issued the same day, pre-trial motions are due to the Court on October 10th, 2018.
3. The deadline for pre-trial motions has *not* passed as of the filing of this request for extension.
4. The extension is requested because:

- a. Counsel for Defendant has not yet had time to review new discovery pursuant to the charges added in the third superseding indictment;
  - b. Changes to the existing charges in the third superseding indictment change the nature of that indictment and counsel for Defendant has not yet been able to determine what pre-trial motions may be appropriate.
  - c. The superseding indictment includes new charges and counsel for Defendant has not been able to determine what pre-trial motions may be appropriate with regard to those charges.
5. The requested extension will **not** delay trial in this matter.
  6. Counsel for Defendant has conferred with counsel for the Government and the Government **consents** to the requested extension.

WHEREFORE, Defendant respectfully requests that the deadline for pre-trial motions be extended to October 25th, 2018 with responses due

October 31st, 2018 and hearing on such motions as required on November 5, 2018.

Respectfully submitted, this the 10th day of October, 2018.

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### Certificate of Service

This is to certify that the undersigned has this date electronically filed (under seal) the foregoing Consent Motion to Extend Deadline for Pre-Trial Motions using the Court's CM/ECF System, which will send notice to the following:

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This is the 10th day of October, 2018.

/s/ Paul M. Dubbeling  
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